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Attorneys for Specially-Appearing Defendant
UBIQUITI NETWORKS INTERNATIONAL LIMITED

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SYNOPSYS, INC.,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., UBIQUITI
NETWORKS INTERNATIONAL LIMITED,
CHING-HAN TSAI, and DOES 1-20,
inclusive

Defendants.

Case No. 5:17-cv-00561-WHO

**REPLY DECLARATION OF
SHENG-FENG WANG IN
SUPPORT OF DEFENDANT
UBIQUITI NETWORKS
INTERNATIONAL LIMITED
(UNIL)'S MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION PURSUANT TO
RULE 12(b)(2)**

Date: May 17, 2017

Time: 2:00 p.m.

Place: Courtroom 2, 17th Floor

Judge: Honorable William H. Orrick

1 I, Sheng-Feng Wang, declare as follows:


2 1. My name is Sheng-Feng Wang and I am employed by Ubiquiti Networks, Inc.,
3 ("Ubiquiti"). I submit this reply declaration in support of UNIL's Reply Brief in Support of
4 UNIL's Motion to Dismiss for Lack of Personal Jurisdiction Pursuant to Rule 12(b)(2). I have
5 personal knowledge of the facts contained in this declaration.

6 2. I am one of only two California-based Ubiquiti employees that, at all relevant
7 times, worked on semiconductor chip design activities with employees of Ubiquiti Networks
8 International Limited ("UNIL"). My colleague, Ching Han Tsai, is the other Ubiquiti employee
9 involved in this work. To the best of my knowledge, no other California-based Ubiquiti
10 employees interacted with or had reason to interact with employees of Ubiquiti Networks
11 International Limited ("UNIL") in connection with the subject matter alleged in Synopsys'
12 lawsuit.

13 3. While present in California, I never received any transmission from any UNIL
14 employee containing unauthorized license keys or unauthorized copies of Synopsys' software.
15 To the best of my knowledge, no UNIL employee ever transmitted to any Ubiquiti employee in
16 California unauthorized license keys or unauthorized copies of Synopsys' software.

17
18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed this 1st day of May, 2017, in San Jose, California.

21
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23 By: 
24 Sheng-Feng Wang
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